

EXHIBIT 3

RYAN GERMANY
FAIR FIGHT ACTION vs RAFFENSPERGER

December 11, 2019

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1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE NORTHERN DISTRICT OF GEORGIA
3 ATLANTA DIVISION

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5 CASE NUMBER: No. 1:18-CV-05391-SCJ

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7 FAIR FIGHT ACTION, INC; CARE IN ACTION, INC;
8 EBENEZER BAPTIST CHURCH OF ATLANTA, GEORGIA,
9 INC.; BACONTON MISSIONARY BAPTIST CHURCH, INC;
VIRGINIA-HIGHLAND CHURCH, INC.; and THE SIXTH
EPISCOPAL DISTRICT, INC.,

Plaintiffs,

10 vs.

11 BRAD RAFFENSPERGER, in his official capacity
12 as Secretary of State of the State of Georgia
and as Chair of the State Election Board of
Georgia; REBECCA N. SULLIVAN, DAVID J. WORLEY,
13 and SETH HARP, in their official capacities as
members of the STATE ELECTION BOARD; and STATE
ELECTION BOARD,

14 Defendants.

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17 VIDEOTAPED DEPOSITION

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OF

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RYAN GERMANY

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December 11, 2019

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REPORTED BY:

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J. Ashley Arrowood, RPR, CRR

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1 A. You can register generally up
2 to -- it's 30 days before the election.

3 Q. Okay. What I'm positing is: A
4 person who didn't pay attention to the
5 postcards says, "Okay, I'm going to go vote
6 today" and goes in and finds that they have
7 been canceled, they can't vote that day, can
8 they?

9 A. So that person would not be
10 registered to vote, so they could vote --
11 there's a process that they could vote
12 provisionally. If they're not registered --
13 if they didn't reregister, then generally,
14 no, they would not be.

15 Q. So you're using the term "not
16 registered" to mean that when they have been
17 removed from the roll, they're no longer
18 registered?

19 A. Correct. Yes, sir. That's
20 right.

21 THE WITNESS: Are we at a point
22 where we can --

23 MR. CHANDLER: We absolutely can
24 stop any time you --

25 THE WITNESS: Whenever is good

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1 for you.

2 MR. CHANDLER: Now is fine.

3 THE WITNESS: Okay.

4 MR. CHANDLER: Take off your
5 tether.

6 THE VIDEOGRAPHER: We are going
7 off the record at 10:32 a.m.

8 (Said deposition was in recess
9 at 10:32 a.m. until 10:45 a.m.,
10 after which the following
11 occurred:)

12 THE VIDEOGRAPHER: We are going
13 back on the record at 10:45 a.m.

14 Q. (BY MR. CHANDLER:) A couple more
15 questions about Exhibit 105, the first page of
16 that December list.

17 Does Secretary of State use any
18 other methods to try to figure out whether
19 people have moved other than no contact?

20 A. Other than no contact and
21 national change of address and returned mail?

22 Q. Yes.

23 A. So no. We have recently joined
24 a multistate group called ERIC.

25 Q. ERIC.